

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

RALPH DEMMICK, on behalf of himself and all others similarly situated; DONALD BARTH, on behalf of himself and all others similarly situated,

Plaintiffs,

v.

CELLCO PARTNERSHIP, a Delaware General Partnership doing business as Verizon Wireless; and DOES 1 through 10,

Defendant.

Civ. Act. No. 06-2163 (JLL)

Honorable José L. Linares

Motion Date: August 3, 2015

**OBJECTOR WANDA J. COCHRAN'S OPPOSITION TO
PLAINTIFFS' MOTION FOR APPEAL BOND [Doc. 502]**

NOW COMES Objector/Appellant Wanda J. Cochran ("Cochran") to oppose

Plaintiffs' motion to require her and other objectors to post an appeal bond in the sum

of \$55,000 [Doc. 205]. In addition to joining in the response briefs filed by

Objector/Appellants Kimberly Baker and Kendrick Jan, Cochran adds several points specific to her appeal.

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Wanda J. Cochran
1385 Russell Drive
Streetsboro, Ohio 44241
Tel: (330) 414-9322
Email: wandacochran7@gmail.com
Objector/Appellant
Appearing Pro Se

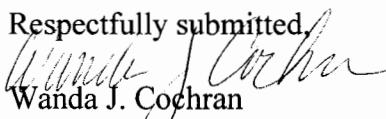
**OBJECTOR WANDA J. COCHRAN'S OPPOSITION TO
PLAINTIFFS' MOTION FOR APPEAL BOND [Doc. 502]**

For her response to Plaintiffs' motion for an appeal bond, Cochran elects to join in the arguments set forth in Objector/Appellants Kimberly Baker's [Doc. 207] and Kendrick Jan's [Doc. 209] briefs in opposition. In addition, Cochran offers the following points germane to her specific appeal:

1. Plaintiffs' brief incorrectly identifies Cochran as an attorney.
2. That Cochran may have objected to other class settlements no more implicates the merits of her present appeal than does class counsel's involvement in numerous other class actions betray the fairness of the present settlement.
3. It is also ironic that class counsel emphasizes the need for adequate representation in certifying a class action only to quash any challenge to the settlement's adequacy precisely when an objecting class member is most vulnerable to attack.
4. It is particularly offensive when the very lawyers charged with receiving an excessive award attempt to derail legitimate appeals under the guise of an appeal bond.

For all of the foregoing reasons, Plaintiffs' request must be denied.

Dated: July 23, 2015

Respectfully submitted,

Wanda J. Cochran
1385 Russell Drive
Streetsboro, Ohio 44241
Tel: (330) 414-9322
Email: wandacochran7@gmail.com
Objector/Appellant
Appearing Pro Se

Certificate of Service

The undersigned hereby certifies that a true copy of the foregoing document was served by First Class U.S. Mail to the following on July 23, 2015:

U.S. District Court
District of New Jersey
50 Walnut Street
Newark, NJ 07101

Robert A. Curtis, Esq.
Foley Bezek Behle & Curtis, LLP
15 West Carrillo Street
Santa Barbara, CA 93101

Henry Weissmann, Esq.
Munger, Tolles & Olson LLP
355 South Grand Ave., 35th Floor
Los Angeles, CA 90071

Kendrick Jan
402 W. Broadway
San Diego, CA 92101

Janet Hale
1033 Williams Rd.
Burnet, TX 78611-5652

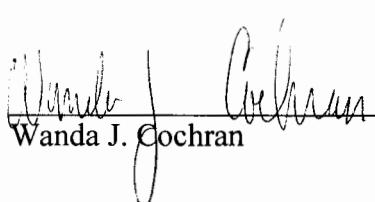
Michael J. Rinis
4128 NW 13th St.
Gainesville, FL 32609

Michael Narkin
85391 Chezem Rd.
Eugene, OR 97405

Thomas D. Domonoske
461 Lee Avenue
Harrisburg, VA 22802

Shannon L. Adams
223 View St.
Asheville, NC 28806

John Finn
5241 Del Sur Circle
La Palma, CA 90623-2211


Wanda J. Cochran

